

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 20-cr-1566 DHU
)	
TIMOTHY CHISCHILLY,)	
)	
Defendant.)	

**DEFENDANT CHISCHILLY'S UNOPPOSED MOTION TO CONTINUE TRIAL SET
FOR AUGUST 22, 2022 AND PRETRIAL DEADLINES**

Defendant, Timothy Chischilly, by and through his counsel of record, Robert J. Gorence of the Gorence Law Firm, LLC, and Justine Fox-Young of the Law Office of Justine Fox-Young, respectfully moves to continue the trial set in this matter for August 22, 2022, and all Pretrial Deadlines for a period not less than ninety (90) days. As grounds, Mr. Chischilly states as follows:

1. Mr. Chischilly was arraigned on August 20, 2020.
2. On December 27, 2021, the Court set this matter for trial beginning August 22, 2022.
3. Undersigned counsel were both recently appointed in this matter and they need additional time to investigate all possible defenses, to review the voluminous discovery in this matter, to make a determination as to potential experts, and to meet face-to-face with Mr. Chischilly to review the applicable discovery with him, to discuss the details of prior plea discussions and issues that came up during his change of plea hearing.
4. Mr. Chischilly agrees that the time period of the extension shall be excluded in computing time within which the trial must commence pursuant to 18 U.S.C. §3161(h)(1)(H),

and 18 U.S.C. §3161(h)(7)(A). Mr. Chischilly further states that the above-stated grounds for this request serve the ends of justice and outweigh the best interest of the public and the Defendant in a speedy trial.

5. Undersigned counsel contacted AUSA Frederick Mendenhall for the government's position and he does not oppose the relief requested in this Motion.

FOR THE FOREGOING REASONS, Defendant Timothy Chischilly respectfully requests that the Court enter an order vacating the current trial setting of August 22, 2022, and reset trial and the pretrial deadlines for a period of not less than ninety (90) days.

Respectfully submitted,

/s/ Robert J. Gorence
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Attorneys for Defendant Timothy Chischilly

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of April, 2022, I filed the foregoing electronically through the Court's CM/ECF system, which caused the following counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Frederick Mendenhall, Attorney for the United States
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/s/ Robert J. Gorence
Robert J. Gorence